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Attorneys for Plaintiff  
TERRY SHIBAO

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

TERRY SHIBAO,

Plaintiff,

v.

ALEXANDRA PLUTA,

Defendant.

**CIVIL NO. 13-00090 KSC**

**PLAINTIFF'S *EX PARTE* MOTION  
FOR VOLUNTARY DISMISSAL  
WITHOUT PREJUDICE OF ALL  
CLAIMS ASSERTED BY  
PLAINTIFF IN COMPLAINT  
FILED ON FEBRUARY 26, 2013  
AGAINST DEFENDANT  
ALEXANDRA PLUTA;  
DECLARATION OF MICHI  
MOMOSE; EXHIBITS "1"- "3";  
[PROPOSED] ORDER GRANTING  
PLAINTIFF'S *EX PARTE* MOTION  
FOR VOLUNTARY DISMISSAL  
WITHOUT PREJUDICE OF ALL  
CLAIMS ASSERTED BY  
PLAINTIFF IN COMPLAINT  
FILED ON FEBRUARY 26, 2013  
AGAINST DEFENDANT  
ALEXANDRA PLUTA;**

**CERTIFICATE OF SERVICE**

**PLAINTIFF'S *EX PARTE* MOTION FOR VOLUNTARY DISMISSAL  
WITHOUT PREJUDICE OF ALL CLAIMS ASSERTED BY PLAINTIFF IN  
COMPLAINT FILED ON FEBRUARY 26, 2013 AGAINST  
DEFENDANT ALEXANDRA PLUTA**

Plaintiff TERRY SHIBAO (“**Plaintiff**”), by and through his attorneys,  
Cades Schutte LLP, hereby moves this Court *ex parte* for an Order Dismissing  
Without Prejudice All Claims Asserted by Plaintiff in Complaint Filed On  
February 26, 2013 Against Defendant Alexandra Pluta.

This *ex parte* Motion is made pursuant to Rules 7 and 41(a)(2) of the Federal  
Rules of Civil Procedure, the court’s instructions to Plaintiff’s counsel at the status  
conference on September 26, 2014, and is supported by the attached declaration,  
exhibits, and the files and records filed herein.

DATED: Honolulu, Hawaii, October 27, 2014.

CADES SCHUTTE LLP

/s/ Michi Momose

MILTON M. YASUNAGA

MICHI MOMOSE

Attorneys for Plaintiff

TERRY SHIBAO